

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEBRASKA**

MEGAN MCGUIRE,	)	
	)	Case No. 8:16-cv-00004
Plaintiff,	)	
	)	
v.	)	Senior Judge Joseph Bataillon
	)	
CORY COOPER, TIMOTHY DUNNING,	)	Magistrate Judge Susan M. Bazis
Individually and in his official capacity as	)	
Sheriff of Douglas County, Nebraska, and	)	
DOUGLAS COUNTY,	)	
	)	JURY TRIAL DEMANDED
Defendants.	)	

**PLAINTIFF'S RESPONSE TO DEFENDANTS TIMOTHY F. DUNNING'S  
AND DOUGLAS COUNTY'S MOTIONS FOR SUMMARY JUDGMENT**

**EXHIBIT 58**

**United States District Court  
District of Nebraska**

Megan McGuire, Plaintiff	)	
	)	
	)	Case No. 8:16-cv00004
Vs.	)	
	)	
	)	
Cory Cooper,	)	
Timothy Dunning,	)	
Douglas County.	)	

**Defendant Cory Cooper's Responses to Plaintiff's first requests of interrogatories and request for production of documents.**

**Defendant Cooper's response to Plaintiff's first set of interrogatories:**

- 1) Cory Cooper, [REDACTED], Omaha, NE 68127. [REDACTED].
- 2) Any additional names will be submitted as soon as possible.

Former and current Douglas County Sheriff's Office employees: Andy Woodward, Eric Olsen, Mike Jones, Nate Kovarik, Theresa Organzali, Joe Martinec, Shawn Milikan, Rick Kozoil, David Galvon.

Douglas County Sheriff's Office  
3601 N. 156<sup>th</sup> St.  
Omaha, NE 68116  
(402) 444-6641

Jamie Rollins  
Unknown address and phone number.

- 3) County witnesses will be called to demonstrate discrepancies between policy and what was considered common practice, or what was acceptable practices, at the time. Jamie Rollins will be called to testify about a conversation that she and the plaintiff had in which the plaintiff made statements that her sworn statements were not true.

- 4) Defendant Cooper is unaware of any complaints.
- 5) Defendant Cooper is unaware and not in any possession of any documents in regards to this interrogatory.
- 6) Defendant Cooper is unaware of any document fitting this description.
- 7) 3<sup>rd</sup> Degree Assault and Attempted Tampering with Evidence, June 10, 2015, 6 months jail on each charge,
- 8) Douglas County Corrections, 710 S. 17<sup>th</sup> St., Omaha, NE. Corrections officer. 2004-2008. No complaints. Douglas County Sheriff's Office, Omaha, NE. Deputy Sheriff. 2008-2013. Current complaint. Unknown internal complaint number. Builder's Supply Company, Inc., Omaha, NE, No complaints. United Parcel Service, Omaha, NE. Driver. No complaints.
- 9) Defendant Cooper does not believe that he is in possession of his training records. Plaintiff can request these records from Douglas County Sheriff's Office. The Sheriff's Office should be able to provide this information in addition to training logs and rosters.
- 10) Defendant Cooper does not currently have possession of the policies and procedures in effect at the time of the complaint, but believes that he acted in accordance with common practices.
- 11) The affirmative defense is that the complaint and allegation of sexual assault described by the plaintiff is not true.
- 12) No interaction, written or otherwise, with the plaintiff outside of the interaction that occurred on February 10 as a result of law enforcement interaction.
- 13) Douglas County Sheriff's Office completed an internal investigation, all reports, recording, documents and personnel assigned to this would have to be requested through their office.
- 14) Defendant Cooper does not recall the make and model of the phone used at the time of the complaint. Defendant Cooper believes that the service provider was Sprint. The phone number was (402) 659-8039.
- 15) Yes.
- 16) No.
- 17) Defendant Cooper separated the parties as an interview and interrogation tactic. Defendant Cooper spoke with both parties individually and collectively to determine any discrepancies in their statements and then attempted to expand the investigation by speaking to the individually again.
- 18) Defendant Cooper allowed the plaintiff's boyfriend to discard suspected contraband based on officer discretion. Common practice, complacency, lack of foresight, and laziness were all factors.
- 19) Defendant Cooper currently has one Employee Stock Option Plan from Builder's Supply Company, with an unknown amount in it. Defendant Cooper has no other known assets over \$2500 and has personal debt owed to family members. Defendant Cooper currently works as a seasonal employee.
- 20) Defendant Cooper may call witnesses from "Now You Know" Private investigations. 7551 Main St Ste 216, Ralston, NE 68127 (402) 596-2880. Expected testimony includes follow up investigations requested by Defendant Cooper, photos, and measurements.
- 21) Defendant Cooper refutes the Plaintiff's' claims of a sexual assault.

**Verification**

I, Defendant Cory Cooper, verify that I have completed and reviewed the answers to the interrogatories, request for admissions, and request for production and certify that the answers are true as I verily believe.

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Defendant Cory Cooper

Subscribed and sworn to me on this \_\_\_\_ day of \_\_\_\_\_, 2016.

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Notary Public